

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:99CV01318
)	
COMPUTER ASSOCIATES)	JUDGE: Gladys Kessler
INTERNATIONAL, INC. and)	
PLATINUM TECHNOLOGY)	DECK TYPE: Antitrust
INTERNATIONAL, INC.,)	
)	DATE STAMP: 05/25/99
Defendants.)	
)	

**STIPULATED MOTION OF THE PARTIES TO PLACE
EXHIBIT ONE TO FINAL JUDGMENT UNDER SEAL**

By this stipulated Motion, Plaintiff and Defendants move this Court pursuant to Local Court Rule 106(j) and Fed. R. Civ. P. 26(c) for an order permitting the United States to file under seal Exhibit 1 to the proposed Final Judgment.

Exhibit 1 is a list of a small number of individuals who Defendants may continue to subject to employment-related non-competition clauses as they relate to the Divested Products (as defined by the Final Judgment). Enforcement of these individuals' non-competition clauses are an express exception to Section V.D of the proposed Final Judgment, which otherwise prohibits Defendants from enforcing such clauses as to any employee hired by the Acquirer (as defined by the Final Judgment) of the Divested Products. The individuals named in Exhibit 1 are subject to confidential employment agreements, and revealing the terms of such agreements or the identities of such individuals may disclose Defendants' confidential commercial information. The parties agree that public disclosure of the identity of the individuals named in Exhibit 1 is

not necessary to the Court's evaluation whether the proposed Final Judgment is in the public interest pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16.

Therefore, the parties move for an Order in the form attached hereto permitting Exhibit 1 to the proposed Final Judgment to be filed and maintained under seal.

Respectfully submitted,

FOR PLAINTIFF
UNITED STATES OF AMERICA:

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FOR DEFENDANTS
Computer Associates International, Inc. and
PLATINUM *technology* International, *inc.*:

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Dated: _____

